

# U.S. FISH AND WILDLIFE SERVICE SPECIES ASSESSMENT AND LISTING PRIORITY ASSIGNMENT FORM

**Scientific Name:**

Hylaeus kuakea

**Common Name:**

Hawaiian yellow-faced bee

**Lead region:**

Region 1 (Pacific Region)

**Information current as of:**

06/01/2013

**Status/Action**

☐ Funding provided for a proposed rule. Assessment not updated.

☐ Species Assessment - determined species did not meet the definition of the endangered or threatened under the Act and, therefore, was not elevated to the Candidate status.

☐ New Candidate

☒ Continuing Candidate

☐ Candidate Removal

☐ Taxon is more abundant or widespread than previously believed or not subject to the degree of threats sufficient to warrant issuance of a proposed listing or continuance of candidate status

☐ Taxon not subject to the degree of threats sufficient to warrant issuance of a proposed listing or continuance of candidate status due, in part or totally, to conservation efforts that remove or reduce the threats to the species

☐ Range is no longer a U.S. territory

☐ Insufficient information exists on biological vulnerability and threats to support listing

☐ Taxon mistakenly included in past notice of review

☐ Taxon does not meet the definition of "species"

☐ Taxon believed to be extinct

☐ Conservation efforts have removed or reduced threats

\_\_\_ More abundant than believed, diminished threats, or threats eliminated.

## **Petition Information**

\_\_\_ Non-Petitioned

X Petitioned - Date petition received: 03/23/2009

90-Day Positive:06/16/2010

12 Month Positive:09/06/2011

Did the Petition request a reclassification? **No**

### **For Petitioned Candidate species:**

Is the listing warranted(if yes, see summary threats below) **Yes**

To Date, has publication of the proposal to list been precluded by other higher priority listing?  
**Yes**

Explanation of why precluded:

We find that the immediate issuance of a proposed rule and timely promulgation of a final rule for this species has been, for the preceding 12 months, and continues to be, precluded by higher priority listing actions (including candidate species with lower LPNs). During the past 12 months, the majority of our entire national listing budget has been consumed by work on various listing actions to comply with court orders and court-approved settlement agreements; meeting statutory deadlines for petition findings or listing determinations; emergency listing evaluations and determinations; and essential litigation-related administrative and program management tasks. We will continue to monitor the status of this species as new information becomes available. This review will determine if a change in status is warranted, including the need to make prompt use of emergency listing procedures. For information on listing actions taken over the past 12 months, see the discussion of Progress on Revising the Lists, in the current CNOR which can be viewed on our Internet website (<http://endangered.fws.gov/>).

## **Historical States/Territories/Countries of Occurrence:**

- **States/US Territories:** Hawaii
- **US Counties:** Honolulu, HI
- **Countries:** United States

## **Current States/Counties/Territories/Countries of Occurrence:**

- **States/US Territories:** Hawaii
- **US Counties:** Honolulu, HI
- **Countries:** United States

## **Land Ownership:**

*Hylaeus kuakea* is known from a total of two populations on State land on the island of Oahu (Magnacca 2007a, p. 184; Magnacca, in litt. 2011).

## Lead Region Contact:

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## Biological Information

### Species Description:

*Hylaeus kuakea* is similar in structure to other hymenopterans (bees, wasps, and ants) in that adults have three main body parts—a head, thorax, and abdomen. One pair of antennae arises from the front of the head, between the eyes. Two pairs of wings and three pairs of legs are attached to the thorax. The abdomen is composed of multiple segments (Borror et al. 1989, pp. 665-666).

The *Hylaeus* genus, which includes *H. kuakea*, are commonly known as yellow-faced bees or masked bees for their yellow-to-white facial markings. All of the *Hylaeus* species roughly resemble small wasps in appearance, due to their slender bodies and their seeming lack of setae (sensory hairs). However, *Hylaeus* bees have plumose (branched) hairs on the body that are longest on the sides of the thorax. To a discerning eye, it is these plumose setae that readily distinguish them from wasps (Michener 2000, p. 55).

Overall in terms of appearance, *H. kuakea* does not fit into any of the well-defined *Hylaeus* species groups. The species is small in size, and black in color with slightly smoky-colored wings. Its facial marks are similar to those of the *H. difficilis* group and to *H. anthracinus*, but it can be distinguished by its unusual ivory facial marking covering the clypeus (the lower face region). *H. kuakea* also resembles *H. anthracinus*, but has a denser, more distinct arrangement of setae (sensory hairs) on the head and generally narrower marks next to the compound eyes (Daly and Magnacca 2003, p. 125; Magnacca 2005e, p. 2). Only four adult male specimens have been collected; females have yet to be collected or observed.

### Taxonomy:

*Hylaeus kuakea* was first described by Daly and Magnacca (2003, pp. 1, 125-1,127) from specimens collected in 1997 in the Waianae Mountains on Oahu.

### Habitat/Life History:

The general life cycle of *Hylaeus kuakea* is typical of most solitary bees: after mating, females create a nest in which to lay eggs that will hatch and develop into larvae (immature stage); as larvae grow, they molt (shed their skin) through three successive stages (instars); when fully grown, the larvae change into pupae (a resting form) in which they metamorphose and emerge as adults (Borror et al. 1989, p. 665).

Hawaiian *Hylaeus* species are grouped within two categories: ground-nesting species that require relatively dry conditions, and stem-nesting species that are often found within wetter areas (Zimmerman 1972, p. 533; Daly and Magnacca 2003, p. 11). *H. kuakea* is believed to be a stem-nesting species and likely constructs nests opportunistically within existing burrows inside dead twigs or plant stems. This is unlike the nest construction of many other bee species, which are purposefully excavated or constructed underground. All *Hylaeus* spp., including the Hawaiian *Hylaeus* species, lack strong mandibles and other adaptations for digging and often use nest burrows abandoned by other insect species (Daly and Magnacca 2003, p. 9). *H. kuakea* females lay eggs in brood cells she constructs in the nest and lines with a self-secreted, cellophane-like material. Prior to sealing the nest, the female provides her young with a mass of semiliquid

nectar and pollen left alongside her eggs. Upon hatching, the grub-like larvae eat the provisions left for them, grow and molt through three instar stages, pupate, and eventually emerge as adults (Michener 2000, p. 24).

The exact diet of the larval stage of *H. kuakea* is unknown, although the larvae are presumed to feed on stores of pollen and nectar collected and deposited in the nest by the adult female (Daly and Magnacca 2003, p. 9). Likewise, the exact nesting habits of *H. kuakea* are not known, but the species is thought to nest within the stems of mesic shrub species (Magnacca and Danforth 2006, p. 403). The native host plants of the adult *H. kuakea* are unknown, but it is likely this species feeds upon flower nectar from several plants other *Hylaeus* species are known to frequent, including *Acacia koa* (koa), *Metrosideros polymorpha* (ohia), *Styphelia tameiameia* (pukiawe), *Scaevola* spp. (naupaka), and *Chamaesyce* spp. (akoko) (Magnacca 2005e, p. 2). *H. kuakea*, like most *Hylaeus* species, lack an external structure for carrying pollen, called a scopa, and instead internally transport collected pollen, often mixed with nectar, within their crop (stomach).

Recent studies of visitation records of Hawaiian *Hylaeus* bees to native flowers (Daly and Magnacca 2003, p. 11) and pollination studies of native plants (Sakai et al. 1995, pp. 2,524-2,528; Cox and Elmqvist 2000, p. 1,238; Sahli et al. 2008, p. 1) have demonstrated Hawaiian *Hylaeus* species almost exclusively visit native plants to collect nectar and pollen, pollinating those plants in the process. *Hylaeus* bees are very rarely found visiting nonnative plants for nectar and pollen (Magnacca 2007a, pp. 186, 188) and are almost completely absent from habitats dominated by nonnative plant species (Daly and Magnacca 2003, p. 11). Sahli et al. (2008, p. 1) quantified pollinator visitation rates to all of the flowering plant species in communities on a Hawaiian lava flow dating from 1855 to understand how pollination webs and the integration of native and nonnative species changes with elevation. In that study, eight flowering plants were observed at six sites, which ranged in elevation from approximately 2,900 to 7,900 feet (ft) (approximately 880 to 2,400 meters (m)). The study also found the proportion of native pollinators changed along the elevation gradient; at least 40 to 50 percent of visits were from nonnative pollinators at low elevation, as opposed to 4 to 20 percent of visits by nonnative pollinators at mid to high elevations. *Hylaeus* bees were less abundant at lower elevations, and there were lower visitation rates of any pollinators to native plants at lower elevations, which suggest *Hylaeus* may not be easily replaceable by nonnative pollinators (Sahli et al. 2008, p. 1).

### **Historical Range/Distribution:**

In 1997, researchers collected two male individuals of *Hylaeus kuakea* in lowland mesic forest at an elevation of about 1,900 ft (579 m) on Moho Gulch Ridge at the northern end of the States recently acquired Honouliuli Preserve in the Waianae Mountains on Oahu. Researchers surveyed the middle and southern portions of the Preserve, but they did not find *H. kuakea*, although other species of *Hylaeus* are known from these areas. In 2010, researchers collected this species (two males), on the endangered plant *Chamaesyce herbstii* (akoko) in a remnant patch of diverse lowland mesic forest in Makaha Valley on Oahu's west side (Magnacca, in litt. 2011, p. 1). Phylogenetically, *H. kuakea* belongs in a species-group primarily including mesic forest-inhabiting species (Magnacca and Danforth 2006, p. 405).

### **Current Range Distribution:**

Because the first collection of *Hylaeus kuakea* was not made until 1997, its historical range is unknown (Magnacca 2005e, p. 2; Magnacca 2007a, p. 184). Only four individuals (all males) of *H. kuakea* have been collected at two different sites in lowland mesic forest habitat in the Waianae Mountains on Oahu (Magnacca 2007a, p. 184; Magnacca, in litt. 2011, p. 1), and the species has never been collected in any other habitat type or area, including some that have been more thoroughly surveyed (Magnacca, in litt. 2011, p. 49). Researchers have not exhaustively surveyed all potentially suitable lowland mesic forest areas due to their remote and rugged locations, small size, and distant spacing among large areas of nonnative forest. Lowland mesic forest habitat is becoming increasingly rare and patchily distributed on Oahu (Smith 1985, pp. 227-233; Juvik and Juvik 1998, p. 124; Wagner et al. 1999, pp. 66-67, 75).

### **Population Estimates/Status:**

*Hylaeus kuakea* is currently known from two small patches of lowland mesic forest habitat (Magnacca 2005a, p. 2) on the island of Oahu. In total, only four males of this species have ever been collected (no females), and the size of these populations is unknown (Magnacca 2007a, p. 184; Magnacca, in litt. 2011, p. 1). Table 1, below, summarizes information about the current population sites for this species.

Table 1. Occupied population sites and habitat conservation status of *Hylaeus kuakea* on the island of Oahu.

	Population Site	Island	Landowner	Last Year Observed (or surveyed)	Approx. Size in Acres	Habitat Conservation Status & Threats
1	Moho Gulch Ridge (Honouliuli Preserve)	Oahu	State	1997	Unknown	Conserved
2	Makaha Valley	Oahu	State	2010	Unknown	Not conserved

## Threats

### A. The present or threatened destruction, modification, or curtailment of its habitat or range:

Degradation and loss of lowland habitat is the primary threat to *Hylaeus kuakea* (Cuddihy and Stone 1990, pp. 60-61; Daly and Magnacca 2003, pp. 55, 173; Magnacca 2007a, p. 188). Lowland forest habitats have been severely altered and degraded, partly because of past and present land management practices, including agriculture, grazing, and urban development; the deliberate and accidental introductions of nonnative animals and plants; and recreational activities. In addition, fire is a potential threat to the habitat of *H. kuakea* in some locations.

#### Habitat Destruction and Modification by Urbanization and Land Use Conversion

Destruction and modification of *Hylaeus* bee habitat by urbanization and land use conversion leads to the direct loss and fragmentation of foraging and nesting habitat of *H. kuakea*. In particular, because native host plant species are known to be essential to *H. kuakea* for foraging of nectar and pollen, any further loss of this habitat may endanger its long-term chances for conservation and recovery. Additionally, conversion and modification of suitable habitat for *H. kuakea* is also likely to further exacerbate the introduction and spread of nonnative plants into and within these areas (see Habitat Destruction and Modification by Nonnative Plants section below).

#### Lowland Mesic Habitat

Hawaii's lowland mesic forest habitat was once abundant and considered the most diverse (in terms of number of species) of all Hawaiian forest types (Rock 1913, p. 9). Lowland mesic forest habitat is now very rare and has been converted to pasture, military use, or agricultural use, or lost to urbanization. Development and land use conversion is ongoing (Cuddihy and Stone 1990, p. 61; Magnacca 2007, p. 187; Wagner et al. 1999, p. 75). Fire has also negatively impacted this habitat type and remains a significant threat (see Habitat Destruction and Modification by Fire section below).

*H. kuakea* is known from a total of two locations in lowland mesic forest habitat on the island of Oahu. Because we lack information on the historical range of *H. kuakea* (the species was only discovered relatively recently), we are unable to determine the extent of habitat loss this species has experienced. However, because the extent and the quality of lowland mesic forest has been reduced throughout the Hawaiian Islands, it is reasonable to conclude *H. kuakea* now has less habitat because of urbanization and land use conversion.

In summary, destruction and modification by urbanization and land use conversion of the lowland habitat of *H. kuakea* is continuing, and is expected to continue reducing and fragmenting the remaining habitat available to this species in the future, endangering the species long-term chances for conservation and recovery. Because of the decreased amount of suitable native lowland habitat remaining in the Hawaiian Islands and the continued conversion of these native habitats by development, road building, or agriculture, we conclude the ongoing habitat loss and land modification is a significant ongoing threat to *H. kuakea*.

#### Habitat Destruction and Modification by Nonnative Plants

Native vegetation on all of the main Hawaiian Islands has undergone extreme alteration because of past and present land management practices, including ranching, agricultural development, and the deliberate introduction of nonnative plants and animals (Cuddihy and Stone 1990, pp. 27, 58). The original native flora of Hawaii (species that were present before humans arrived) consisted of about 1,000 taxa, 89 percent of which were endemic (species that occur only in the Hawaiian Islands). Over 800 plant taxa have been introduced from elsewhere, and nearly 100 of these have become pests (e.g., injurious plants) in Hawaii (Smith 1985, p. 180; Cuddihy and Stone 1990, p. 73; Gagne and Cuddihy 1999, p. 45). Some of these plants were brought to Hawaii by various groups of people, including the Polynesians, for food or cultural reasons. Beginning in the early 1900s, plantation owners (and the territorial government of Hawaii), alarmed at the reduction of water resources for their crops caused by the destruction of native forest cover by grazing feral and domestic animals, introduced nonnative trees for reforestation and continued the practice through the late 1930s (The Nature Conservancy (TNC) 2003, p. 19). Ranchers intentionally introduced pasture grasses and other nonnative plants for agriculture, and sometimes inadvertently introduced weed seeds as well. Other plants were brought to Hawaii for their potential horticultural value (Scott et al. 1986, pp. 361-363; Cuddihy and Stone 1990, p. 73).

Nonnative plants adversely impact native Hawaiian habitat, including that of *H. kuakea*, by modifying the availability of light, altering soil-water regimes, modifying nutrient cycling, and altering fire characteristics of native plant communities. A major concern is that successive fires burn farther and farther into native habitat, destroy native plants, and remove habitat for native species by altering microclimatic conditions to favor nonnative species), and ultimately converting native dominated plant communities to nonnative plant communities (Smith 1985, pp. 180-181; Cuddihy and Stone 1990, p. 74; DAntonio and Vitousek 1992, p. 73; Vitousek et al. 1997, p. 6). Nonnative plants directly and indirectly affect *H. kuakea* by modifying or destroying its lowland forest habitat and reducing food sources.

The spread of nonnative plant species is one of the primary causes of decline of *H. kuakea*, and a current threat to its existing populations because the species depends closely on native vegetation for nectar and pollen. *Hylaeus* bees in general are almost entirely absent from habitat dominated by invasive, nonnative vegetation (Sakai et al. 2002, pp. 276, 291; Daly and Magnacca 2003, p. 11; Liebherr 2005, p. 186). The native flora within most of lowland habitat in the Hawaiian Islands is being replaced by aggressive, nonnative plant species (Cuddihy and Stone 1990, pp. 73-74; Wagner et al. 1999, p. 52). Many native plant species communities that have been replaced by often monotypic communities of nonnative plants were once foraging resources for numerous species of *Hylaeus* bees including *H. kuakea* (Cox and Elmqvist 2000, p. 1,238; Daly and Magnacca 2003, p. 11; USFWS 1999, pp. 145, 163, 171, 180; USFWS 2008b, pp. 7, 9).

Many of the native plants that currently serve as foraging resources for *H. kuakea* are declining due to a lack of pollinators and competition with nonnative plants (Daly and Magnacca 2003, p. 11; USFWS 2008b, pp. 7, 9; Smith 1985, pp. 180-181; Cuddihy and Stone, 1990, p. 74; DAntonio and Vitousek 1992, p. 73; Vitousek et al. 1997, p. 6) and are found only in very small populations (USFWS 1999, pp. 145, 163, 171, 180; Cox and Elmqvist 2000, p. 1,238). As noted in the Life History section, above, *Hylaeus* species almost exclusively visit native plants to collect nectar and pollen (Daly and Magnacca 2003, p. 11), pollinating those plants in the process (Sakai et al. 1995, pp. 2,524-2,528; Cox and Elmqvist 2000, p. 1,238; Sahli et al. 2008, p. 1). *Hylaeus* bees are very rarely found visiting nonnative plants for nectar and pollen (Magnacca 2007a, pp. 186, 188). Unpublished data on *Hylaeus* spp. pollen use (Magnacca, in litt. 2011, p. 65) suggest only

approximately three percent of pollen collected by yellow-faced bees in general is from nonnative plant sources.

In summary, the spread of nonnative plants throughout the lowland habitat of *H. kuakea* represents a serious and ongoing threat to this species. Many of the native plant species being replaced by invasive, nonnative plants provide foraging resources (e.g. pollen, nectar) for *Hylaeus* bees, including *H. kuakea*. The best available information indicates *H. kuakea* does not characteristically forage on nonnative plants (Daly and Magnacca 2003, p. 13). Only 14 of 820 recent (1998 to 2010) *Hylaeus* spp. observations were on flowers of nonnative plant species; however, none of those observations involved *H. kuakea*. Therefore, we conclude that the ongoing spread of nonnative plants into the habitats of *H. kuakea* remains a significant threat due to manner in which nonnative plants alter and fragment habitat, increase the likelihood of fire, and attract nonnative insect species. This threat further endangers the species long-term chances for conservation and recovery.

#### Habitat Destruction and Modification by Nonnative Ungulates

The presence of nonnative mammals, such as feral pigs (*Sus scrofa*), cattle (*Bos taurus*), goats (*Capra hircus*), and axis deer (*Axis axis*), is considered one of the primary factors underlying the alteration and degradation of native vegetation and habitat in the Hawaiian Islands (Stone 1985, pp. 262-263; Cuddihy and Stone 1990, pp. 60-66; 73 FR 73801). Beyond the direct effects of trampling and consuming native plants, nonnative ungulates contribute significantly to increased erosion, and their behavior (i.e., rooting and moving across large areas) facilitates the spread and establishment of competing, invasive, nonnative plant species (Cuddihy and Stone 1990, p. 65). Feral pigs occur on all of the main Hawaiian Islands except Kahoolawe and Lanai (HEAR 1998; Kessler 2011, pers. comm.); and goats are found on all of the main Hawaiian Islands except Lanai (HEAR 1998).

The State of Hawaii provides game mammal (e.g., feral pigs, goats, and deer) hunting opportunities on State-designated public hunting areas on the islands of Hawaii, Kauai, Lanai, Maui, Molokai, and Oahu (Hawaii Administrative Rules § 13-123-1413-123-20; Department of Land and Natural Resources (DLNR) 1999). The States management objectives for game animals ranges from maximizing public hunting opportunities (e.g., sustained yield) in some areas to removal by State staff, or their designees, in other areas (Hawaii Administrative Rules § 13-123). *H. kuakea* has populations in or adjacent to areas where terrestrial habitat may be manipulated for game enhancement and where game populations are maintained at certain levels for public hunting (Hawaii Administrative Rules § 13-123). Public hunting areas are predominantly not fenced, and game mammals have unrestricted access to most areas across the landscape, regardless of underlying land use designation. While fences are sometimes built to provide protection from game mammals to the natural resources within the fenced area, the current number and locations of fences are not adequate to prevent habitat destruction and degradation of the lowland mesic habitat of *H. kuakea*.

In summary, feral pigs and goats continue to alter and degrade native vegetation within *H. kuakea* habitat in the Hawaiian Islands. We believe these ungulates represent a significant and ongoing threat to the continued existence of *H. kuakea*, endangering the species long-term chances for conservation and recovery. Ungulates directly trample and consume native plants, including plants used for foraging by *H. kuakea*. The best available information indicates that *H. kuakea* does not use nonnative plants for foraging (Daly and Magnacca 2003, p. 13). While some specific areas throughout the State, including some *H. kuakea* habitat sites, are managed to exclude the presence of or control ungulates, we are unaware of any plans to entirely eradicate or eliminate ungulates from the Hawaiian Islands. In addition, public hunting areas maintain populations of nonnative ungulates and often do not provide adequate fencing to prevent nonnative ungulates from negatively impacting the habitat of *H. kuakea*. Therefore, the ongoing alteration and degradation of many of the native lowland habitat where *H. kuakea* occurs by ungulates is expected to further impact this species foraging and nesting habitat through the direct consumption and trampling of native plants, introduction and spread of nonnative plants, and increased erosion.

## Habitat Destruction and Modification by Fire

Fire is a relatively new, human-exacerbated threat to native species and natural vegetation in Hawaii. The historical fire regime in Hawaii was characterized by infrequent, low severity fires, as few natural ignition sources existed (Cuddihy and Stone 1990, p. 91; Smith and Tunison 1992, pp. 395-397). Natural fuel beds were often discontinuous, with moderate to high rainfall in many areas on most islands. Fires inadvertently or intentionally ignited by the original Polynesians in Hawaii probably contributed to the initial decline of native vegetation in the drier plains and foothills. These early settlers practiced slash-and-burn agriculture that created open lowland areas suitable for the later colonization of nonnative, fire-adapted grasses (Kirch 1982, pp. 5-6, 8; Cuddihy and Stone 1990, pp. 30-31). Beginning in the late 18th century, Europeans and Americans introduced plants and animals that further degraded native Hawaiian ecosystems. Pasture areas and ranching, in particular, created highly fire-prone areas of nonnative grasses and shrubs (DAntonio and Vitousek 1992, p. 67). Fires of all intensities, seasons, and sources are destructive to native Hawaiian ecosystems (Brown and Smith 2000, p. 172), and a single grass-fueled fire can kill most native trees and shrubs in the burned area (DAntonio and Vitousek 1992, p. 74). Although Vogl (1969) (in Cuddihy and Stone 1990, p. 91) suggests naturally occurring fires, primarily from lightning strikes, have been important in the development of the original Hawaiian flora, and many Hawaiian plants might be fire-adapted, Mueller-Dombois (1981) (in Cuddihy and Stone 1990, p. 91) points out most natural vegetation types of Hawaii would not carry fire before the introduction of nonnative grasses. Smith and Tunison (in Cuddihy and Stone 1990, p. 91) state that native plant fuels typically have low flammability.

Fire represents a threat to *H. kuakea* in lowland mesic habitat. Fire threatens *H. kuakea* by destroying the native plant species and communities on which the species depends and opening up habitat for increased invasion by nonnative plants. Fire can destroy dormant seeds of native plants as well as the plants themselves. Successive fires that burn farther and farther into native habitat destroy native plants and remove habitat for native plant and animal species by altering microclimate conditions favorable to nonnative plants. Nonnative plant species most likely to be spread as a consequence of fire are those that (1) produce a high fuel load; (2) are adapted to survive and regenerate after fire; and (3) establish rapidly in newly burned areas. Grasses (particularly those that produce mats of dry material or retain a mass of standing dead leaves) that invade native forests and shrublands provide fuels that allow fire to burn areas that would not otherwise easily burn, including even the edges of wetter forests (Fujioka and Fujii 1980, in Cuddihy and Stone 1990, p. 93; DAntonio and Vitousek 1992, pp. 70, 73-74; Tunison et al. 2002, p. 122). Native woody plants may recover from fire to some degree, but fire tips the competitive balance toward nonnative species (National Park Service 1989, in Cuddihy and Stone 1990, p. 93).

For example, on a post-burn survey at Puuwaawaa on the island of Hawaii, an area of native *Diospyros* forest with undergrowth of the nonnative grass *Pennisetum setaceum* (fountain grass), Takeuchi noted no regeneration of native canopy is occurring within the Puuwaawaa burn area (Takeuchi 1991, p. 2). Takeuchi also stated, Burn events served to accelerate a decline process already in place, compressing into days a sequence which would ordinarily have taken decades (Takeuchi 1991, p. 4). The author concluded that in addition to increasing the number of fires, the nonnative *P. setaceum* acted to suppress establishment of native plants after a fire (Takeuchi 1991, p. 6).

There have been several recent fires on Oahu that have impacted rare or endangered species in coastal, lowland dry, and mesic habitats. Between 2004 and 2005, wildfires burned more than 360 ac (146 ha) of mesic habitat in Honouliuli Preserve, home to more than 90 rare and endangered plants and animals and located along the windward side of the Waianae Mountains (TNC, in litt. 2005). In 2006, a fire at Kaena Point State Park burned 60 ac (24 ha) and encroached on endangered plants in Makua Military Reservation Army Training Area. In 2007, there was a significant fire in lowland dry and mesic habitat at Kaukonahua that crossed 12 gulches, eventually encompassing 5,655 ac (2,289 ha), negatively impacting seven endangered plant species. Occurrences of several native species were extirpated as a result of the fire. The Kaukonahua fire also provided pathways for nonnative ungulates (cattle, goats, and pigs) to access previously undisturbed areas. This fire opened gaps in previously densely vegetated areas allowing the growth of the



invasive grass *Panicum maximum* (guinea grass), which is also used as a food source by cattle and goats. An area infested by *P. maximum* burned, and the grass resprouted blades over two feet in length only two weeks after the fire (U.S. Army Garrison 2007, p. 3). In 2009, there were two smaller fires which burned 200 ac (81 ha) at Manini Pali (Kaena Point State Park) and 3.8 ac (1.5 ha) at Makua Cave (at the mouth of Makua Valley). These examples of recent fires illustrate nonnative grass invasion leads to grass/fire cycles that convert native vegetation to grassland (DAntonio and Vitousek 1992, p. 77).

Several areas in the State of Hawaii, including some areas containing *Hylaeus* spp. habitat sites, are currently loosely addressed under fire management plans. For example, in 2003, the Army completed an Integrated Wildland Fire Management Plan (WFMP) for all of its Oahu training installations. This plan is currently being updated (U.S. Army 2009, pp. 4-73). The goal of the WFMP is to reduce the threat of wildfire that adversely affects listed and other rare species. Although no candidate yellow-faced bees are known from military land on Oahu, at least one species, *H. kuakea*, occurs on land roughly adjacent to military land along the Schofield Barracks East Range and could be impacted by fires caused by military activities, or conversely, could benefit from activities to suppress and control origination of fires either on or adjacent to military land.

Additionally, the State Division of Forestry and Wildlife (DOFAW) maintains a fire management program tasked with fire suppression activities targeted toward the protection of watershed areas, forest reserves, public hunting areas, wildlife and plant sanctuaries, and Natural Area Reserves (NARS). Their activities include the maintenance of firebreak roads, signage, and helicopter dip tanks; active fire control during fire outbreak; controlled burns when and where deemed necessary; fire training efforts, including education; and maintenance of a State fire management program website (<http://www.state.hi.us/dlnr/dofaw/fmp>). According to their website, DOFAW is involved in the protection of 3,360,000 acres statewide, which is approximately 81 percent of the State's land area.

In summary, while we are aware of fire management in some areas of the State, including some *H. kuakea* habitat sites, there is evidence that the repeated outbreak of fire within Hawaii's native coastal, lowland dry, and lowland mesic forests often leads to the irrevocable conversion of native to nonnative habitat (i.e., nonnative plant species). These nonnative habitats are unsuitable for nesting and foraging by *H. kuakea*. Therefore, we conclude fire is a significant ongoing threat to the habitat of *H. kuakea* in lowland mesic habitat.

#### Habitat Destruction and Modification by Recreational Activities

Some of the best habitat areas for the seven candidate *Hylaeus* species, including *H. kuakea*, are also popular recreational sites, particularly those areas located within coastal habitat (Magnacca 2007a, p. 180). Human impacts at recreational sites can include removal or trampling of vegetation on or near trails and the compaction of vegetation by off-road vehicles (Magnacca 2007a, p. 180). However, we are not aware that any of *H. kuakea* habitat areas are actually being impacted by recreational activities currently.

In summary, while trampling and compaction of vegetation from human activities may negatively impact the habitat of some populations of *H. kuakea*, we have no basis to conclude these impacts would be at a scale that represents a threat to the species, and we believe this is a local rather than a range-wide problem for *H. kuakea*. Therefore, we conclude that recreational activities are not a threat to this species at this time.

#### Habitat Destruction and Modification by Hurricanes and Drought

Stochastic (random, naturally occurring) events, such as hurricanes and drought, can alter or degrade the habitat of *H. kuakea* directly by modifying and destroying native lowland mesic habitats (e.g., by mechanical damage to vegetation). Indirect effects include creating disturbed areas conducive to invasion by nonnative plants, which outcompete the native plants used by the species for foraging of nectar and pollen. We presume these events also alter microclimatic conditions (e.g., opening the tree canopy leading to an increase in

habitat temperature, soil erosion, and decreasing soil moisture) so that the habitat no longer supports the native host plants necessary to *H. kuakea* for nectar and pollen foraging, as well as nesting.

Hurricanes affecting Hawaii were only rarely reported from ships in the area from the 1800s until 1949. Between 1950 and 1997, 22 hurricanes passed near or over the Hawaiian Islands, 5 of which caused serious damage (Businger 1998, pp. 1-2). In November 1982, Hurricane Iwa struck the Hawaiian Islands, with wind gusts exceeding 100 miles per hour (mph) (161 kilometers per hour (kph)), causing extensive damage, especially on the islands of Niihau, Kauai, and Oahu (Businger 1998, pp. 2, 6). Many forest trees were destroyed (Perlman 1992, pp. 1-9), which opened the canopy and facilitated the invasion of nonnative plants (Kitayama and Mueller-Dombois 1995, p. 671). Habitat alteration and degradation by nonnative plants is a threat to the habitat of *H. kuakea*, as described in the Habitat Destruction and Modification by Nonnative Plants section above. In September 1992, Hurricane Iniki, a category 4 hurricane with maximum sustained wind speeds recorded at 140 mph (225 kph), passed directly over the island of Kauai and close to the island of Oahu, causing significant damage to areas along Oahu's southwestern coast (Barbers Point or Kalaeloa, through Kaena) (Blake et al. 2007, p. 20). Damage by future hurricanes could further decrease the remaining native-plant-dominated habitat areas that support this species (Bellingham et al. 2005, p. 681).

*H. kuakea* may also be affected by temporary habitat loss (e.g., desiccation of habitats, die-off of host plants) associated with droughts, which are not uncommon on the Hawaiian Islands. Between 1860 and 2002, the Hawaiian Islands were affected by approximately 49 periods of drought (Giambelluca et al. 1991, pp. 3-4; Hawaii Commission on Water Resource Management 2009a and 2009b). These drought events lead to an increase in the number of forest and brush fires (Giambelluca et al. 1991, p. v), causing a reduction of native plant cover and habitat (DAntonio and Vitousek 1992, pp. 77-79). With populations that have likely been reduced in both abundance and geographic distribution, even such a temporary loss of habitat can have a severe negative impact on *H. kuakea* if, for example, the host plants for nectar and pollen foraging are lost for one or more seasons. Because small populations are demographically vulnerable to extinction caused by random fluctuations in population size and sex ratio, stochastic events such as hurricanes pose the threat of immediate extinction of a species with a very small and geographically restricted distribution such as *H. kuakea* (Lande 1988, p. 1,455).

In summary, natural disasters, such as hurricanes and drought, represent a significant threat to lowland mesic habitats and *H. kuakea*, endangering its chance for conservation and recovery. These types of events are known to cause significant habitat damage, and because the species now persists in low numbers within a restricted range, it is more vulnerable to these events and less resilient to such habitat disturbances. Hurricanes and drought, even though unpredictable, have been and are expected to continue to be threats to the *H. kuakea*, and they therefore pose immediate and ongoing threats to the species and its habitat.

#### Habitat Destruction and Modification by Climate Change

Climate change will be a particular challenge for biodiversity because the interaction of additional stressors may push species beyond their ability to survive (Lovejoy et al. 2005, pp. 325-326). The synergistic implications of climate change and habitat fragmentation are the most threatening facet of climate change for biodiversity (Lovejoy et al. 2005, p. 4). The magnitude and intensity of the impacts of global climate change and increasing temperatures on native Hawaiian ecosystems are unknown; we are not aware of climate change studies specifically related to the lowland mesic habitat areas occupied by *H. kuakea*, or to other *Hylaeus* bee species. Based on the best available information, climate change impacts could include the loss of native plant species that comprise the habitats in which *H. kuakea* occurs (Pounds et al. 1999, pp. 611-612; Still et al. 1999, p. 610; Benning et al. 2002, pp. 14,246, 14,248); however, because no climate change studies have looked at the effects to coastal and lowland habitat, we have no way of predicting the amount or extent of any such possible habitat loss. Because the host plant habitat of *H. kuakea* is well outside of the tidal and immediate near shore zone, we do not expect any direct effects to its habitat from sea level rise itself.

In addition, *H. kuakea* may be vulnerable to changes in precipitation caused by global climate change. However, future changes in precipitation are uncertain because they depend in part on how El Nino (a disruption of the ocean atmospheric system in the tropical Pacific having important global consequences for weather and climate) might change, and reliable projections of changes in El Nino have yet to be made (Benning et al. 2002, pp. 14,248-14,249). Oki (2004, p. 4) has noted long-term evidence of decreased precipitation and stream flow in the Hawaiian Islands, based upon evidence collected by stream gauging stations. This long-term drying trend, coupled with periodic El Nino-caused drying events, has created a pattern of severe and persistent stream dewatering events (Polhemus, in litt 2008, p. 26). Future changes in precipitation and the forecast of those changes are highly uncertain because they depend, in part, on how the El Nino-La Nina (a different disruptive extreme weather and climate pattern that can alternate with El Nino) weather cycle might change (Hawaii Climate Change Action Plan 1998, pp. 2-10).

If precipitation is significantly reduced, *H. kuakea* may be among the species most vulnerable to extinction, with possible impacts expected to include habitat loss and alteration or changes in disturbance regimes (e.g., storms and hurricanes), in addition to possible direct physiological stress of an unknown nature, which could potentially cause the species to seek out less suitable habitats as its preferred habitats become degraded. The probability of a species going extinct as a result of these factors increases when ranges are restricted, habitat decreases, and population numbers decline (Intergovernmental Panel on Climate Change 2007, p. 8). Such is the case for *H. kuakea*, which is characterized by a limited climatic range and restricted habitat requirements, small population size, and low number of individuals. However, without reliable predictions of the amount and extent of anticipated precipitation change, we are unable to determine whether precipitation changes would result in negative impacts to *H. kuakea* at this time.

In summary, *H. kuakea*, like most insects, is presumed to have limited environmental tolerances. This species also has a limited range and restricted habitat requirements (Daly and Magnacca 2003, p. 11). The projected effects of global climate change and increasing temperatures on *H. kuakea* would likely be related to changes in microclimatic conditions in its habitats. These changes may also lead to the loss of native plant species due to direct physiological stress, the loss or alteration of habitat, increased competition from nonnative bee species, and changes in disturbance regimes (e.g., fire, storms, and hurricanes). Therefore, we believe *H. kuakea* will be exposed to projected environmental impacts that may result from changes in climate, and subsequent impacts to its habitats (Pounds et al. 1999, pp. 611-612; Still et al. 1999, p. 610; Benning et al. 2002, pp. 14,246, 14,248), and we do not anticipate a reduction in this ongoing threat any time in the near future. However, because the specific and cumulative effects of climate change on this species are presently unknown, we are not able to determine the magnitude of this potential threat with confidence or precision.

Summary of Factor A - The present or threatened destruction, modification, or curtailment of its habitat or range

*H. kuakea* is dependent upon the persistence of native Hawaiian plants and their increasingly rare associated habitat types, particularly lowland mesic habitat areas. As identified above in our Factor A analysis, the native habitats on which *H. kuakea* depend have been drastically directly altered during the last century, with many areas either converted for development or agriculture, or indirectly altered due to the effects of nonnative ungulates, nonnative plants, and fire. Habitat conversion and loss of host plants, and other stochastic events (e.g., hurricanes and drought), are all contributing factors to the present and threatened destruction, modification, and curtailment of the habitat and range of *H. kuakea*.

Land conversion and fragmentation of remaining lowland mesic habitat is continuing throughout this species known range, particularly due to the effects of feral ungulates, fire, and nonnative plants (Magnacca, in litt. 2011, p. 78). We anticipate habitat conversion and fragmentation to continue, and likely increase, throughout its known range. As discussed above, *H. kuakea* has experienced significant habitat losses. As more habitats become unsuitable, we expect its population declines to continue or accelerate.

We have evaluated the best scientific and commercial information available regarding the present or

threatened destruction, modification, or curtailment of *H. kuakea* habitat or range. Based on the current and ongoing habitat issues identified, their synergistic effects, and their likely continuation, we have determined this factor poses a significant threat to *H. kuakea*.

## **B. Overutilization for commercial, recreational, scientific, or educational purposes:**

We are unaware of any collections of *Hylaeus kuakea* by recreational or insect enthusiast collectors. However, insect collecting is a valuable component of research, including taxonomic work, and is often necessary to document the existence of populations and population trends. Based on comments received in response to the 90-day finding for this species, *H. kuakea* is not believed to be particularly threatened by over-collection (Magnacca, in litt. 2010, p. 2).

## **C. Disease or predation:**

### **Disease**

We are not aware of any information indicating disease presents a threat to *Hylaeus kuakea*.

### **Predation**

#### Predation by Nonnative Ants

Ants are known to prey upon *Hylaeus* species (Medeiros et al. 1986, pp. 45-46; Reimer 1994, p. 17), thereby directly eliminating them from specific areas. In one particular study, nests of *Nesoprosopis* sp., an endemic ground-nesting bee, could not be found in ant-infested plots but were commonly encountered in ant-free sites of the same habitat. *Nesoprosopis* was reduced to a subgenus of *Hylaeus* in 1923 (Meade-Waldo 1923, p. 1). Ants are not a natural component of Hawaii's arthropod fauna, and the native *Hylaeus* species of the islands evolved in the absence of predation pressure from ants. Ants can be particularly destructive predators because of their high densities, recruitment behavior, aggressiveness, and broad range of diet (Reimer 1993, pp. 17-18). The threat of ant predation on *H. kuakea* is amplified by the fact that most ant species have winged reproductive adults (Borror et al. 1989, p. 738) and can quickly establish new colonies in suitable habitats (Staples and Cowie 2001, p. 55). In addition, these attributes allow some ants to destroy otherwise geographically isolated populations of native arthropods (Nafus 1993, pp. 19, 22-23). Ants have not been observed preying upon *H. kuakea*. However, at least one or more of the most aggressive and widespread species (discussed below) occur in the two known population sites of *H. kuakea* and are presumed to be a serious threat due to the impact of predation.

At least 47 species of ants are known to be established in the Hawaiian Islands (Hawaii Ants 2008, pp. 1-11). Native insect fauna, likely including *H. kuakea* (Zimmerman 1948, p. 173; Reimer et al. 1990, pp. 40-43; HEAR 2005, pp. 1-2), have been severely impacted by at least four particularly aggressive ant species: *Pheidole megacephala* (big-headed ant), *Anoplolepis gracilipes* (long-legged ant or yellow crazy ant), *Solenopsis papuana* (no common name), and *Solenopsis geminata* (no common name). Numerous other species of ants are recognized as threats to Hawaii's native invertebrates, and an unknown number of new species of ants are established every few years (Staples and Cowie 2001, p. 53). Due to their preference for drier habitat sites, ants are more likely to occur in high densities in the mesic habitat currently occupied by *H. kuakea* (Reimer 1994, p. 12).

*Pheidole megacephala* originated in central Africa (Krushelnycky et al. 2005, p. 24) and was first reported in Hawaii in 1879 (Krushelnycky et al. 2005, p. 24). This species is considered one of the most invasive and widely distributed ants in the world (Krushelnycky et al. 2005, p. 5). In Hawaii, this species is the most ubiquitous ant species found, from coastal to mesic habitat up to 4,000 ft (1,219 m) in elevation, including within the habitat areas of *H. kuakea*. With few exceptions, native insects have been eliminated in habitats where *P. megacephala* is present (Perkins 1913, p. xxxix; Gagne 1979, p. 81; Gillespie and Reimer 1993, p.

22). Consequently, *P. megacephala* represents a threat to populations of *H. kuakea* within its mesic habitat on Oahu (Reimer 1993, p. 14; Reimer 1994, p. 17; Daly and Magnacca 2003, pp. 9-10).

*Anoplolepis gracilipes* appeared in Hawaii in 1952, and now occurs on Hawaii, Kauai, Maui, and Oahu (Reimer et al. 1990, p. 42; Antweb 2011). It inhabits low- to mid-elevation (less than 2,000 ft (600 m)) rocky areas of moderate rainfall (less than 100 in (250 cm) annually) (Reimer et al. 1990, p. 42). Although surveys have not been conducted to ascertain this species presence in each of the known habitat sites occupied by *H. kuakea*, we may presume that it likely occurs within some of the identified population sites based upon anecdotal evidence of their expanding range and their preference (as indicated where the species is most commonly collected) for coastal and dry forest habitats (Antweb 2011). Direct observations indicate Hawaiian arthropods are susceptible to predation by this species; Gillespie and Reimer (1993, p. 21) and Hardy (1979, pp. 37-38) documented the complete extirpation of several native insects within the Kipahulu area on Maui after this area was invaded by *A. gracilipes*. Lester and Tavite (2004, p. 391) found that *A. gracilipes* in the Tokelau Atolls (New Zealand) can form very high densities in a relatively short period of time with locally serious consequences for invertebrate diversity. Densities of 3,600 individuals collected in pitfall traps within a 24-hour period were observed, as well as predation upon invertebrates ranging from crabs to other ant species. On Christmas Island in the Indian Ocean, numerous studies have documented the range of impacts to native invertebrates, including *Gecarcoidea natalis* (red land crab), as a result of predation by supercolonies of *A. gracilipes* (Abbott 2006, p. 102). *A. gracilipes* colonies have the potential as predators to profoundly affect the endemic insect fauna in territories they occupy. Studies comparing insect populations at otherwise similar ant-infested and ant-free sites found extremely low numbers of large endemic noctuid moth larvae (*Agrostis* spp. and *Peridroma* spp.) in ant-infested areas. Nests of ground-nesting cottelid bees (*Nesoprosopis* spp.) were eliminated from ant-infested sites (Reimer et al. 1990, p. 42). Although only cursory observations exist in Hawaii (Reimer et al. 1990, p. 42), we believe these ants are a threat to populations of *H. kuakea*, within its mesic habitats on Oahu.

*Solenopsis papuana* is the only abundant, aggressive ant that has invaded intact mesic to wet forest, as well as coastal and lowland dry habitats. This species occurs from sea level to over 2,000 ft (600 m) on all of the main Hawaiian Islands, and is still expanding its range (Reimer 1993, p. 14). Although surveys have not been conducted to ascertain the presence of *S. papuana* in each of the known habitat sites occupied by *H. kuakea*, because of the expanding range of this species and its widespread occurrence in mesic habitats, it is a possible threat to both of the known populations of *H. kuakea* (Reimer et al. 1990, p. 42; Reimer 1993, p. 14).

Like *Solenopsis papuana*, *S. geminata* is also considered a significant threat to native invertebrates (Gillespie and Reimer 1993) and occurs on all the main Hawaiian Islands (Reimer et al. 1990; Nishida 1997). Found in drier areas of the Hawaiian Islands, it has displaced *P. megacephala* as the dominant ant in some localities (Wong and Wong 1988, p. 175). Known to be a voracious nonnative predator in many areas to where it has spread, the species was documented to significantly increase fruit fly mortality in field studies in Hawaii (Wong and Wong 1988, p. 175). In addition to predation, *S. geminata* workers tend honeydew-producing members of the Homoptera suborder, especially mealybugs, which can impact plants directly and indirectly through the spread of disease (Manaaki Whenua Landcare Research 2011).

*Solenopsis geminata* was included among the eight species ranked as having the highest potential risk to New Zealand in a detailed pest risk assessment for the country (Global Invasive Species Database 2011), and is included as one of five ant species listed among the 100 of the Worlds Worst invaders (Manaaki Whenua Landcare Research 2011).

Although surveys have not been conducted to ascertain the presence of *S. geminata* in each of the known habitat sites occupied by *H. kuakea*, because of the expanding range of this species and its widespread occurrence in mesic habitats, it is a possible threat to all known populations of *H. kuakea* (Wong and Wong 1988, p. 175).

*Hylaeus* populations are known to be drastically reduced in ant-infested areas (Medeiros et al. 1986, pp.

45-46; Stone and Loope 1987, p. 251; Cole et al. 1992, pp. 1313, 1317, 1320; Reimer 1994, p. 17). The presence of ants in nearly all of the low-elevation habitat sites historically and currently occupied by *H. kuakea* may increase the uncertainty of this species recovery within some of these areas (Reimer 1994, pp. 17-18; Daly and Magnacca 2003, pp. 9-10). Although the primary impact of ants on the native invertebrate fauna is via predation (Reimer 1994, p. 17), they also compete for nectar (Howarth 1985, p. 155; Hopper et al. 1996, p. 9; Holway et al. 2002, pp. 188, 209; Daly and Magnacca 2003, p. 9; Lach 2008, p. 155) and nest sites (Krushelnycky et al. 2005, pp. 6-7). Some ant species may impact *H. kuakea* indirectly as well, by consuming seeds of native plants, thereby reducing the plants recruitment and fecundity (Bond and Slingsby 1984, p. 1,031). Several studies (Krushelnycky 2005, p. 9; Lach 2008, p. 155) suggest a serious ecosystem-level effect of invasive ants on pollination. Where ranges overlap, ants compete with native pollinators such as *Hylaeus* bees and preclude them from pollinating native plants. For example, *A. gracilipes* is known to actively rob nectar from flowers without pollinating them (Howarth 1985, p. 157). Lach (2008, p. 155) found that *Hylaeus* bees that regularly consume pollen from flowers of *Metrosideros polymorpha* were entirely absent from trees with flowers exposed to foraging by *A. gracilipes* individuals.

The rarity or disappearance of native *Hylaeus* species, including *H. kuakea*, from historically documented localities over the past 100 years is due to a variety of factors. Although we have no direct information that conclusively correlates the rarity of populations of *H. kuakea* due to the establishment of nonnative ants, severe predation of other *Hylaeus* species by ants has been documented, resulting in clear reductions in populations. We expect similar predation impacts to *H. kuakea* to continue as a result of the widespread presence of ants throughout the Hawaiian Islands, their highly efficient and non-specific predatory behavior, and their ability to quickly disperse and establish new colonies. Therefore, we conclude that predation by nonnative ants represents a serious threat to the continued existence of *H. kuakea*, now and into the future.

#### Predation by Nonnative Western Yellow Jacket Wasps

*Vespula pensylvanica* (the western yellow jacket wasp) is a potentially serious threat to *Hylaeus kuakea* (Gambino et al. 1987, p. 170; Wilson et al. 2009, pp. 1-5). *V. pensylvanica* is a social wasp species native to the mainland of North America. It was first reported from Oahu in the 1930s (Sherley 2000, p. 121), and an aggressive race became established in 1977 (Gambino et al. 1987, p. 170). In temperate climates, *V. pensylvanica* has an annual life cycle, but in Hawaii's tropical climate, colonies of this species persist through a second year, allowing them to have larger numbers of individuals (Gambino et al. 1987, p. 170) and thus a greater impact on prey populations. Most colonies are found between approximately 2,000 and 3,500 ft (approximately 600 and 1,050 m) in elevation (Gambino et al. 1990, p. 1,088), although they can also occur at sea level. *V. pensylvanica* is known to be an aggressive, generalist predator (Gambino et al. 1987, p. 170), and has been documented preying upon Hawaiian *Hylaeus* species (although not specifically upon *H. kuakea*) (Wilson et al. 2009, p. 2). However, predation by the western yellow jacket wasp is a potentially significant threat to *H. kuakea* because of the wasps likely presence in habitat occupied by the species combined with its small population sizes. This may present a particular threat to *H. kuakea* because the species is known from only two or population sites. It has been suggested *V. pensylvanica* may compete for nectar with *Hylaeus* species, but we have no information to suggest this represents a threat to *H. kuakea*.

#### Predation by Nonnative Parasitoid Wasps

Native and nonnative parasitoid wasps are known to parasitize some *Hylaeus* species on Oahu, and may pose a threat to Oahu populations of *H. kuakea*, (Daly and Magnacca 2003, p. 10). While the available information indicates some Oahu *Hylaeus* larvae have been parasitized (and subsequently killed) by parasitoid wasps from the Encyrtidae and Eupelmidae families, it is unknown whether these wasps also utilize *H. kuakea* as nutritional hosts for their larvae (Daly and Magnacca 2003, p. 98). We are concerned that *H. kuakea* may be exposed to wasp parasitism, but we are unaware of any information to indicate this is a threat to this species.

#### Summary of Factor C - Disease or predation

We do not find evidence that disease is currently impacting *Hylaeus kuakea*, nor do we have information to indicate disease outbreaks will occur in the future. Although we have no direct information that conclusively correlates the decrease in populations of this species due to the establishment of *V. pensylvanica*, severe predation of other *Hylaeus* species by yellow jacket wasps has been documented, resulting in clear reductions in populations. We expect similar predation impacts to *H. kuakea* to continue as a result of the widespread presence of yellow jacket wasps in many areas throughout the Hawaiian Islands, their highly efficient and non-specific predatory behavior, and their ability to quickly disperse and establish new colonies.

While we are concerned that *H. kuakea* may be threatened by wasp parasitism on Oahu, we are unaware of any information to indicate this is a threat to this species at this time, or that it is likely to become so in the future. The presence of nonnative ants in nearly all lowland habitat historically and currently occupied by *H. kuakea*, combined with the near extirpation of native insects in these areas, suggest predation by nonnative ants is a serious threat to the species. Observations and reports have documented that ants are particularly destructive predators because of their high densities, broad ranges of diet, and ability to establish new colonies in otherwise geographically isolated locations because the reproductive adult ants are able to fly. Because the ranges of *Pheidole megacephala*, *Anoplolepis gracilipes*, *Solenopsis geminata*, and *Solenopsis papuana* overlap the ranges of *H. kuakea*, and based on their observed predatory behavior at other locations where they occur, these nonnative predators represent an imminent and serious threat to *H. kuakea*. Unless these aggressive, nonnative ant predators are eliminated or controlled, we expect this threat to continue or increase. Furthermore, a decrease in the amount and distribution of suitable host plants for foraging could indirectly impact *H. kuakea* by forcing the species to seek less optimal, but predator-free, foraging sites.

#### **D. The inadequacy of existing regulatory mechanisms:**

Currently, there are no Federal, State, or local laws, treaties, or regulations that specifically conserve or protect *Hylaeus kuakea* from the numerous threats facing this species. However, there are some regulations that potentially address the threats posed by introduced, nonnative species; these are discussed below.

##### Inadequate Protection from Nonnative Ungulates

Nonnative ungulates pose a major ongoing threat to *H. kuakea* through destruction and degradation of its habitat. Although some public hunting areas are fenced to prevent the movement of nonnative ungulates to other areas, there are currently no Federal, State, or local laws, treaties, or regulations that adequately address the threats from nonnative ungulates to *H. kuakea* habitat. The absence of regulatory mechanisms exacerbates the threats discussed under Factor A.

##### Inadequate Protection from Introduction of Nonnative Species

The Hawaii Department of Agriculture (HDOA) is the lead State agency in protecting Hawaii's agricultural and horticultural industries, animal and public health, natural resources, and environment from the introduction of nonnative, invasive species (Hawaii Department of Land and Natural Resources (HDLNR) 2003, p. 3-10). While there are several State agencies (HDOA, DLNR, and Hawaii Department of Health) authorized to prevent the entry of pest species into the State, the existing regulations are inadequate for the reasons discussed in the sections below.

In 1995, a partnership called the Coordinating Group on Alien Pest Species (CGAPS), comprised primarily of managers from every major Federal, State, county, and private agency and organization involved in invasive species work in Hawaii, was formed in an effort to influence policy and funding decisions, improve communication, increase collaboration, and promote public awareness (CGAPS 2009). This group facilitated the formation of the Hawaii Invasive Species Council (HISC), which was created by gubernatorial executive order in 2002 to coordinate local initiatives for the prevention and control of invasive species by providing policy-level direction and planning for the State departments responsible for invasive species issues. In 2003, the governor signed into law Act 85, which conveys statutory authority to the HISC to coordinate approaches

among the various State and Federal agencies, and international and local initiatives, for the prevention and control of invasive species (HDLNR 2003, p. 3-15; HISC 2009; Haw. Rev. Stat. section 194-2(a)). Some of the recent priorities for the HISC include interagency efforts to control nonnative species such as the plants *Miconia calvescens* (miconia) and *Cortaderia* sp. (pampas grass), coqui frogs (*Eleutherodactylus coqui*), and ants (HISC 2009). However, in October 2009, HISC approved a 2010 budget that, due to a tighter economy in Hawaii and anticipated budget cuts in State funding support, resulted in a 50 percent reduction in funding with an anticipated setback in conservation achievements and the loss of experienced, highly trained staff (HISC 2009).

#### Inadequate Regulatory Control of Nonnative Invertebrate Species

As noted above (see Factor C, Disease and Predation), predation by nonnative ants and the nonnative yellow jacket wasp is a potentially significant threat to *H. kuakea*. Commercial shipping and air cargo, as well as biological introductions to Hawaii, have resulted in the establishment of over 3,372 species of nonnative insects (Howarth 1990, p. 18; Staples and Cowie 2001, p. 52), with an estimated continuing establishment rate of 20 to 30 new species per year (Beardsley 1962, p. 101; Beardsley 1979, p. 36; Staples and Cowie 2001, p. 52). The prevention and control of introduced pest species in Hawaii is the responsibility of Hawaii State government and Federal agencies, along with a few private organizations. Even though these agencies have regulations and some controls in place, complete control of introduced pest species is difficult to achieve. Consequently, the introduction and movement of nonnative invertebrate pest species, including nonnative ants and yellow jacket wasps, between islands and from one watershed to the next, continues.

#### Inadequate Regulatory Control of Nonnative Plant Species

Nonnative plants destroy and modify habitat throughout the range of *H. kuakea*. As such, they represent a significant and immediate threat to this species. In addition, nonnative plants have been shown to outcompete native plants and convert native-dominated plant communities to nonnative plant communities (see Factor A, Habitat Destruction and Modification by Nonnative Plants). The HDOA regulates the import of plants into the State from domestic origins under Hawaii State law (Haw. Rev. Stat. Ch. 150A). While all plants require inspection upon entry into the State and must be apparently free of insects and diseases, not all plants require import permits. Parcels brought into the State by mail or cargo must be clearly labeled as Plant Materials or Agricultural Commodities, but, given budget constraints and an insufficient number of personnel, it is unlikely that all of these parcels are inspected or monitored prior to delivery in Hawaii. Shipments of plant material into Hawaii must be accompanied by an invoice or packing manifest listing the contents and quantities of the items imported, although it is unclear if all of these shipments are inspected or monitored prior to delivery (HDOA 2009). There are only 12 plant crops regulated (H.A.R. chapter 4-70) to some degree: sugarcane and grasses, pineapple and other bromeliads, coffee, cruciferous vegetables, orchids, banana, passion fruit, pine, coconut, and palms, and any host plants that harbor either Caribbean fruit fly or European corn borer (HDLNR 2003, p. 3-11). The HDOA also maintains the State list of noxious weeds, and these plants are restricted from entry into the State except by permit from the HDOAs Plant Quarantine Branch.

Although the State has general guidelines for the importation of plants, and regulations are in place regarding the plant crops mentioned above, the intentional or inadvertent introduction of nonnative plants outside the regulatory process and movement of species between islands and from one watershed to the next continues, which represents a threat to native flora and fauna for the reasons described above. In addition, government funding is inadequate to provide for sufficient inspection services and monitoring. One study concluded plant importation laws virtually ensure new invasive plants will be introduced via the nursery and ornamental trade, and outreach efforts cannot keep up with the multitude of new invasive plants being distributed. The author states the only thing wide-scale public outreach can do in this regard is to let the public know new invasive plants are still being sold, and suggest that people should ask for noninvasive or native plants instead (Martin, in litt. 2007, p. 9).



On the basis of the above information, existing regulatory mechanisms do not adequately protect *H. kuakea* from the threat of new introductions of nonnative species, and the continued expansion of nonnative species populations on and between islands and watersheds. Nonnative species may directly compete with, prey upon, consume, or modify or destroy the habitat of *H. kuakea* for food, space, and other necessary resources. Because current Federal, State, and local laws, treaties, and regulations are inadequate to prevent the introduction and spread of nonnative species from outside the State of Hawaii, as well as between islands and watersheds, the threats from these introduced species remain immediate and significant due to an inadequacy of existing regulatory mechanisms.

#### Summary of Factor D - The inadequacy of existing regulatory mechanisms

Existing regulatory mechanisms and agency policies do not address the primary threats to *H. kuakea* and its habitat from nonnative species including ungulates, plants, and arthropods, and the States current management of nonnative game mammals does not prevent the degradation and destruction of habitat of *H. kuakea* (see discussion under Factor A).

We consider the threat from inadequate regulatory mechanisms to be immediate and significant for the following reasons:

1. Existing State and Federal regulatory mechanisms are not preventing the introduction and spread of nonnative species between islands and watersheds; and
2. Habitat-altering nonnative plant species (Factor A) and predation by nonnative animal species (Factor C) pose major ongoing threats to *H. kuakea*. Because existing regulatory mechanisms are inadequate to maintain habitat for *H. kuakea* and to prevent the spread of nonnative species, the inadequacy of existing regulatory mechanisms is considered to be a significant and immediate threat to *H. kuakea*.

#### **E. Other natural or manmade factors affecting its continued existence:**

Species endemic to single islands or known from few, widely dispersed locations are inherently more vulnerable to extinction than widespread species because of the higher risks from genetic bottlenecks, random demographic fluctuations, climate change, and localized catastrophes such as hurricanes, landslides, and drought (Lande 1988, p. 1,455; Mangel and Tier 1994, p. 607; Pimm et al. 1988, p. 757). These problems can be further magnified when populations are few and restricted to a limited geographic area, and the number of individuals is very small. Populations with these characteristics face an increased likelihood of stochastic extinction due to changes in demography, the environment, genetics, or other factors, in a process described as an extinction vortex (Gilpin and Soule 1986, pp. 24-25). Small, isolated populations often exhibit a reduced level of genetic variability or genetic depression due to inbreeding, which diminishes a species capacity to adapt and respond to environmental changes, thereby lessening the probability of long-term persistence (Frankham 2003, pp. S22-S29; Soule 1986, pp. 31-34). The negative impacts associated with small population size and vulnerability to random demographic fluctuations or natural catastrophes can be further magnified by synergistic interactions with other threats.

*Hylaeus kuakea* s very small populations are likely more vulnerable to habitat change and stochastic events due to low genetic variability (Daly and Magnacca 2003, p. 3; Magnacca 2007, p. 173). Although *H. kuakea* was only discovered relatively recently, researchers believe this species was once more widespread when its lowland mesic habitat was not highly fragmented and degraded by invasive species, as is currently the case (Magnacca, in litt. 2011, p. 95). Additionally, the small number of populations known for this species increases its risk of extinction due to stochastic events such as hurricanes, wildfires, or prolonged drought (Jones et al. 1984, p. 209; Smith and Tunison 1992, p. 398).

The recurrence intervals for stochastic events (e.g., wildfires, prolonged drought, and hurricanes) cannot be predicted, which introduces some uncertainty regarding potential effects to *H. kuakea*. The fact that a species is potentially vulnerable to stochastic processes does not necessarily mean it is reasonably likely to

experience or have its status affected by a given stochastic process within timescales meaningful under the Act. Because of its small number of populations, negative impacts to *H. kuakea* from hurricanes, wildfires, and drought would be likely if these events occur. Because these events have been documented on Oahu and other Hawaiian islands in the past, we believe that they represent an ongoing threat to this species, although the specific timing, location, or magnitude is unknown. The threat from fire is unpredictable, but omnipresent in habitats that have been invaded by nonnative, fire-prone grasses. Hurricanes and drought conditions present an ongoing and ever-present threat, because they can occur at any time, although the incidence and magnitude of specific events is not predictable.

### Competition with Nonnative Insects

There are 15 known species of nonnative bees in Hawaii (Snelling 2003, p. 342), including two nonnative *Hylaeus* species (Magnacca 2007, p. 188). Most nonnative bees inhabit areas dominated by nonnative vegetation and do not compete with native Hawaiian bees for foraging resources (Daly and Magnacca 2003, p. 13). *Apis mellifera*, the European honey bee is an exception; this social species is often very abundant in areas with native vegetation and aggressively competes with *Hylaeus* for nectar and pollen (Hopper et al. 1996, p. 9; Daly and Magnacca 2003, p. 13; Snelling 2003, p. 345).

*Apis mellifera* was first introduced to the Hawaiian Islands in 1875, and currently inhabits areas from sea level to the upper tree line boundary (Howarth 1985, p. 156). *A. mellifera* individuals have been observed foraging on *Hylaeus* host plants such as *Scaevola* spp. and *Sesbania tomentosa* (Hopper et al. 1996, p. 9; Daly and Magnacca 2003, p. 13; Snelling 2003, p. 345). Although we lack information indicating Hawaiian *Hylaeus* populations have declined because of competition with *A. mellifera* for nectar and pollen, *A. mellifera* does forage in *Hylaeus* spp. habitat and may exclude *Hylaeus* spp. (Magnacca 2007, p. 188; Lach 2008, p. 155). *Hylaeus* species do not occur in native habitat where there are large numbers of *A. mellifera* individuals, but the impact of smaller, more moderate populations is not known (Magnacca 2007, p. 188). Nonnative, invasive bees are widely documented to decrease nectar volumes and usurp native pollinators (Lach 2008, p. 155). There are also indications that populations of the *A. mellifera* are not as vulnerable as *Hylaeus* bees to predation by nonnative ant species (see Factor C. Disease and Predation). Lach (2008, p. 155) observed that *Hylaeus* bees that regularly collect pollen from the flowers of *Metrosideros polymorpha* trees were entirely absent from trees with flowers visited by *Pheidole megacephala*, while visits by *A. mellifera* were not affected. As a result *A. mellifera* may have a competitive advantage over *Hylaeus* spp., as it is not excluded by *P. megacephala* (Lach 2008, p. 155).

Other nonnative bees found in areas of native vegetation include *Ceratina* spp. (carpenter bees), *Hylaeus albonitens* (Australian colletid bees), and *Lasioglossum impavidum* (no common name) (Magnacca 2007, p. 188). While it has been suggested these nonnative bees may impact native *Hylaeus* bees through competition for pollen based on their similar size and flower preferences, there is no information that demonstrates these nonnative bees forage on *Hylaeus* host plants (Magnacca 2007, p. 188). It has also been suggested parasitoid wasps may compete for nectar with native *Hylaeus* species (Daly and Magnacca 2003, p. 10); however, information demonstrating nonnative parasitoid wasps forage on the same host plants as *H. kuakea* is unavailable.

We acknowledge the potential for negative impacts on *H. kuakea* from competition *A. mellifera* for nectar and pollen (Magnacca 2007, p. 188). In addition, one study in Hawaii suggests *A. mellifera* may have an additional advantage for collecting pollen and nectar because it may not be negatively affected by the presence of predatory *P. megacephala* individuals on native vegetation (Lach 2008, p. 155). Competition with *A. mellifera* may be a potential threat to *H. kuakea* because: (1) *A. mellifera* forage on *Hylaeus* host plant species; (2) they may exclude *Hylaeus* spp. from those resources (*Hylaeus* spp. are never found foraging in the presence of *A. mellifera* bees); and (3) *A. mellifera* may have a competitive advantage over Hawaiian *Hylaeus* sp., as one study suggests honey bees are not negatively affected by the presence of *P. megacephala* individuals on native vegetation to the extent the *Hylaeus* species may be. *A. mellifera* bees have been known to exclude other *Hylaeus* species, and it is well-documented that they forage in native plant

areas. However, the best available scientific information indicates that competition with *A. mellifera* may represent a threat to *H. kuakea*, but the threat is of unknown magnitude, and additional research would be helpful to better understand this interaction.

We have no information indicating other species of nonnative bees or parasitoid wasps negatively impact populations of *H. kuakea* due to competition for nectar and pollen, and have, therefore, determined that competition with other species of nonnative bees or parasitoid wasps is not a threat.

#### Summary of Factor E - Other natural or manmade factors affecting its continued existence

The small number of populations of *H. kuakea* and its inherently small gene pool increases its risk of extinction due to stochastic events such as hurricanes, wildfires, and drought, which, although unpredictable, represent an ongoing and significant threat to the species. We have no information indicating other nonnative bees or parasitoid wasps compete for nectar and pollen on *Hylaeus* host plants. Therefore, we have determined that competition with these species does not present a significant threat to *H. kuakea*. While *A. mellifera* bees forage in native plant areas and have been known to exclude other *Hylaeus* species, the best available information does not indicate competition between *A. mellifera* and *H. kuakea* is a significantly quantifiable threat.

### **Conservation Measures Planned or Implemented :**

The *Hylaeus kuakea* population site within Honouliuli Preserve is protected from development, urbanization, and conversion to agriculture by the State. This area is actively managed to restore native habitat and to reduce or eliminate many of the common threats to the native plant communities found there, including feral ungulates and wildfire. However, existing regulatory mechanisms are inadequate to provide the necessary active management needed to protect the habitat of the one known and other possible populations outside of this protected areas (see discussion under Factor D, above). Conservation of *H. kuakea* will require active management of its known population sites, involving exclusion and removal of feral ungulates, control and removal of nonnative plant and insect species, and the restoration of native vegetation (Magnacca 2007, p. 185).

### **Summary of Threats :**

*Hylaeus kuakea* is known from only two population sites within rare lowland mesic habitat on the island of Oahu, and the species remains threatened by habitat degradation from nonnative feral ungulates, nonnative plants, fire, stochastic events, inadequate regulatory protection, and climate change. The species itself is at risk from inadequate regulatory protection, small population size, and predation by and competition with nonnative insect species. We conclude there is sufficient information to develop a proposed rule for *H. kuakea*, and we find that this species is warranted for listing throughout all its range, and, therefore, find that it is unnecessary to analyze whether it is threatened or endangered in a significant portion of its range.

### **For species that are being removed from candidate status:**

\_\_\_\_\_ Is the removal based in whole or in part on one or more individual conservation efforts that you determined met the standards in the Policy for Evaluation of Conservation Efforts When Making Listing Decisions(PECE)?

### **Recommended Conservation Measures :**

Because existing regulatory mechanisms are inadequate to provide the necessary active management to protect *Hylaeus kuakea*, conservation of the species will require the active control and management of natural areas where populations are known to exist. This active management will involve exclusion and removal of feral ungulates, control and removal of nonnative plant and insect species, improved and increased wild fire

management and control, and the restoration of native vegetation. The continued impact of development, fire, feral ungulates, invasive ants, and the loss of native vegetation to invasive plant species will undoubtedly have a negative impact on the remaining populations of *H. kuakea* and may cause its extinction if habitat is not managed for conservation of this species (Magnacca 2007, p. 185). Necessary management actions should include:

- Protecting host plant populations from feral ungulates including pigs, goats, deer, and cattle;
- Researching and implementing methods to control nonnative plant species within its lowland mesic habitat;
- Researching and implementing control methods, such as poison baiting, for nonnative social insect species including ants;
- Further research into the effects of honey bees on native *Hylaeus* spp.; and
- Conducting field surveys at known locations and in suitable habitat.

## Priority Table

Magnitude	Immediacy	Taxonomy	Priority
<b>High</b>	<b>Imminent</b>	Monotypic genus	1
		<b>Species</b>	<b>2</b>
		Subspecies/Population	3
	Non-imminent	Monotypic genus	4
		Species	5
		Subspecies/Population	6
Moderate to Low	Imminent	Monotype genus	7
		Species	8
		Subspecies/Population	9
	Non-Imminent	Monotype genus	10
		Species	11
		Subspecies/Population	12

### Rationale for Change in Listing Priority Number:

#### Magnitude:

This species is highly threatened by feral ungulates that degrade and destroy host plant habitat and nonnative plants that degrade habitat and compete with native host plants for light, space, and nutrients. Predation by nonnative social insects is also a serious threat. Threats to the native forest habitat of *Hylaeus kuakea*, and to individuals of this species, occur throughout its range and are expected to continue or increase without their control or eradication. No known conservation measures have been taken to date to specifically address these threats.

#### Imminence :

Threats to *Hylaeus kuakea* host plant habitat from feral ungulates and nonnative plants and direct predation by nonnative social insects are considered imminent because they are ongoing.

Yes   Have you promptly reviewed all of the information received regarding the species for the purpose of determination whether emergency listing is needed?

## **Emergency Listing Review**

  No   Is Emergency Listing Warranted?

The species does not appear to be appropriate for emergency listing at this time because the immediacy of the threats is not so great as to imperil a significant proportion of the taxon within the time frame of the routine listing process. If it becomes apparent that the routine listing process is not sufficient to prevent large losses that may result in this species' extinction, then the emergency rule process for this species will be initiated. We will continue to monitor the status of the species as new information becomes available. This review will determine if a change in status is warranted, including the need to make prompt use of emergency listing procedures.

## **Description of Monitoring:**

Much of the information in this form is based upon five petitions we received and dated March 23, 2009, from Scott Hoffman Black, Executive Director of the Xerces Society. The five petitions requested that seven species of Hawaiian yellow-faced bees (including *Hylaeus kuakea*) be listed as Endangered under the Act and critical habitat be designated. Each petition contained information regarding the species taxonomy and ecology, historical and current distribution, present status, and current and potential threats. We acknowledged the receipt of the petitions in a letter to Mr. Black, dated May 8, 2009. In that letter we also stated that issuing an emergency regulation temporarily listing the species under section 4(b)(7) of the Act was not warranted at that time. We published the 90-day finding in the Federal Register on June 16, 2010 (75 FR 34077). On September 6, 2011, we published a 12-month finding in the Federal Register (76 FR 55170), which determined that listing was warranted but precluded.

## **Indicate which State(s) (within the range of the species) provided information or comments on the species or latest species assessment:**

none

## **Indicate which State(s) did not provide any information or comment:**

Hawaii

## **State Coordination:**

On February 20, 2013, we provided the Hawaii Division of Forestry and Wildlife with copies of our most recent candidate assessments for their review and comment. No additional information or comments on this species were received from the State.

## **Literature Cited:**

Alpha, C.G., D.R. Drake, and G. Goldstein. 1996. Morphological and physical responses of *Scaevola sericea* (Goodeniaceae) seedlings to salt spray and substrate salinity. *American Journal of Botany* 83(1):86-92.

Antweb. 2011 Species: *Anoplolepis gracilipes*.

<http://www.antweb.org/description.do?rank=species&name=gracilipes&genus=anoplolepis&project=tokelauan> accessed 2011.

Bond, W., and P. Slingsby. 1984. Collapse of an ant-plant mutualism: the Argentine Ant (*Iridomyrmex*

*humilis*) and Myrmecochorous Proteaceae. Ecology 65:1031-1037.

Borror, D.J., C.A. Triplehorn, and N.F. Johnson. 1989. Introduction to the Study of Insects, 6th ed. Saunders College Publishing, Philadelphia.

Brown, J.K., and J.K. Smith. 2000. Wildland fire in ecosystems: effects of fire on flora. General Technical Report RMRS-GTR-42-vol.2, U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Ogden. 257 pp.

Bruegmann, M.M. 1996. Hawaii's dry forests. Endangered Species Bulletin 11:26-27.

Cabin, R.J., S.G. Weller, D.H. Lorence, T.W. Flynn, A.K. Sakai, D. Sanquist, and L.J. Hadway. 2000. Effects of long-term ungulate exclusion and recent alien species control on the preservation and restoration of a Hawaiian tropical dry forest. Conservation Biology 14:439-453.

Cane, J.H., and V.J. Tepedino. 2001. Causes and extent of declines among native North American invertebrate pollinators: detection, evidence, and consequences. Conservation Ecology 5(1):1. <http://www.consecol.org/vol5/iss1/art1/>, accessed June 23, 2008.

(CGAPS) Coordinating Group on Invasive Pest Species. 2009. CGAPS Vision and Action Plan, December 2009. 14 pp.

Cole, F.R., A.C. Medeiros, L.L. Loope, and W.W. Zuehlke. 1992. Effects of the Argentine ant on arthropod fauna of Hawaiian high-elevation shrubland. Ecology 73:1313-1322.

Cox, P.A., and T. Elmquist. 2000. Pollinator extinction in the Pacific Islands. Conservation Biology 14(5):1237-1239.

Cuddihy, L.W., and C.P. Stone. 1990. Alteration of Native Hawaiian Vegetation: Effects of Humans, Their Activities and Introductions. Honolulu: University of Hawaii Cooperative National Park Resources Studies Unit.

D'Antonio, C.M., and P.M. Vitousek. 1992. Biological invasions by exotic grasses, the grass/fire cycle, and global change. Annual Review of Ecology and Systematics 23:63-87.

Daly, H.V. Unpublished data. *Hylaeus* (*Nesoprosopis*) species recorded from Hawaii sorted by site of collection.

Daly, H.V., and K.N. Magnacca. 2003. Insects of Hawaii: Volume 17: Hawaiian *Hylaeus* (*Nesoprosopis*) Bees (Hymenoptera: Apoidea). Honolulu: University of Hawaii Press.

(DLNR) Department of Land and Natural Resources. 2011. <https://hawaiiitrails.ehawaii.gov/trail.php?TrailID=OA+08+007>). Re: Poamoho Trail & Army lease.

Frankham, R. 2003. Genetics and conservation biology. C.R. Biologies. 326:S22-S29.

Fullaway, D.T. 1918. Notes on Hawaiian Prosopidae. Proceedings of the Hawaiian Entomological Society 3:393-398.

Gagne, W.C. 1979. Canopy-associated arthropods in *Acacia koa* and *Metrosideros* tree communities along an altitudinal transect on Hawaii Island. Pacific Insects 21:56-82.

Gagne, W.C., and L.W. Cuddihy. 1999. Vegetation. In Wagner, W.L., D.R. Herbst and S.H. Sohmer (eds.),

Manual of the Flowering Plants of Hawaii. Bishop Museum and University of Hawaii Press.

Gambino, P., A.C. Medeiros, and L.L. Loope. 1987. Introduced vespids *Paravespula pensylvanica* prey on Maus endemic arthropod fauna. *Journal of Tropical Ecology* 3(2):169-170.

Gambino, P., A.C. Medeiros, and L.L. Loope. 1990. Invasion and colonization of upper elevations on East Maui (Hawaii) by *Paravespula pennsylvanica* (Hymenoptera: Vespidae). *Annals of the Entomological Society of America* 83:1088-1095.

Gilpin, M., and M.E. Soule. 1986. Minimum viable populations. In Soule, M.E. (ed), *Conservation Biology: The Science of Scarcity and Diversity*, Sinauer Associates, Inc, Sunderland. Pp. 24-25.

Gillespie, R.G., and N. Reimer. 1993. The effect of alien predatory ants (Hymenoptera: Formicidae) on Hawaiian endemic spiders (Araneae: Tetragnathidae). *Pacific Science* 47:21-33.

Global Invasive Species Database. 2011. (Regarding invasive ant species status).  
<http://www.issg.org/database/species/ecology.asp?si=169&fr=1&sts=&lang=EN>, accessed July 29, 2011.

Hardy, D.E. 1979. An ecological survey of Puaaluu Stream. Part III. Report on a preliminary entomological survey of Puaaluu Stream, Maui. Cooperative National Park Resources Study Unit. University of Hawaii. Technical Report 27:34-39.

(HDLNR) Hawaii Department of Land and Natural Resources, Division of Forestry and Wildlife. 2007. Draft Environmental Assessment: Kaena Point Ecosystem Restoration Project. Waianae and Waialua Districts, Island of Oahu. <http://www.state.hi.us/dlnr/dofaw/kaena/index.htm>

(HDLNR) Hawaii Department of Land and Natural Resources, Division of Forestry and Wildlife. 2000. Na Ala Hele Trail and Access System. Oahu: Poamoho Ridge Trail and Poamoho Hele Loa Access Road. <http://www.hawaiiitrails.org/trail.php?TrailID=OA+08+007>, accessed October 29, 2008.

(HDLNR) Hawaii Department of Land and Natural Resources. 2008. Natural Area Reserves System: Mount Kaala. <http://hawaii.gov/dlnr/dofaw/nars/reserves/oahu/mountkaala>, Accessed October 29, 2008.

(HDLNR) Hawaii Department of Land and Natural Resources, Division of Forestry and Wildlife. 2005. Hawaii's Comprehensive Wildlife Conservation Strategy. Accessed June 27, 2008.  
<http://www.state.hi.us/dlnr/dofaw/cwcs/index.html>.

(HDLNR) Hawaii Department of Land and Natural Resources, Division of Forestry and Wildlife, Na Ala Hele Trail and Access Program. 2007. Report to the Twenty-Fourth Legislature Session of 2008: Hawaii Statewide Trail and Access System Na Ala Hele. Honolulu, Hawaii.

(HDLNR) Hawaii Department of Land and Natural Resources, Division of Forestry and Wildlife, NARS Program. Information about Kanaio NAR management. <http://hawaii.gov/dlnr/dofaw/rpc/projects-on-maui>, accessed December 2, 2010.

(HDLNR) Hawaii Department of Land and Natural Resources, Division of State Parks. 2010. Information about Kekaha Kai State Park. [http://www.hawaiiistateparks.org/parks/hawaii/index.cfm?park\\_id=47](http://www.hawaiiistateparks.org/parks/hawaii/index.cfm?park_id=47), accessed December 2, 2010.

(HDLNR) Hawaii Department of Land and Natural Resources, Division of Forestry and Wildlife, NARS Program. Information about West Maui NAR management.  
<http://hawaii.gov/dlnr/dofaw/nars/reserves/maui/west-maui>.

(HEAR) Hawaii Ecosystems at Risk Project. 2005. Pest Ants in Hawaii.  
<http://www.hear.org/AlienSpeciesInHawaii/ants/index.html>

(HISC) Hawaii Invasive Species Council. 2009. HISC eNews, Vol. 3, No. 6. October 2009. 1 p.

Holway, D.A., L. Lach, A.V. Suarez, N.D. Tsutsui, and T. J. Case. 2002. The causes and consequences of ant invasions. *Ann. Rev. Syst.* 33:181-233.

Hopper, D., A. Asquith, and M. Bruegmann. Hawaii's Birds and Bees. *Endangered Species Bulletin* 11(6):8-10.

Howarth, F.G. 1985. Impacts of invasive land arthropods and mollusks on native plants and animals in Hawaii. Pp. 149-179. In Stone, C.P., and J.M. Scott (eds.) *Hawaii's Terrestrial Ecosystems: Preservation and Management*. Honolulu: University of Hawaii Press.

Jones, B.L., S.S. W. Chin, and J.C. Brice. 1984. Olokele rock avalanche, island of Kauai, Hawaii. *Geology* 12:209-211.

Juvik, S.P., and J.O. Juvik (eds.). 1998. *Atlas of Hawaii*, 3rd Edition. University of Hawaii Press. 333 pp.

Kirch, P.V. 1982. The impact of the prehistoric Polynesians on the Hawaiian ecosystem. *Pacific Science* 36:1-14.

Kohanaiki Ohana. 1995. Information concerning cultural and recreational preservation and pursuits at Kohanaiki. <http://www.kohanaiki.org/>, accessed July 15, 2008.

Kremen, C., N.M. Williams, M.A. Aizen, B. Gemmill-Herren, G. LeBuhn, R. Minckley, L. Packer, S.G. Potts, T. Roulston, I. Steffan-Dewenter, D.P. Vazquez, R. Winfree, L. Adams, E.E. Crone, S.S. Greenleaf, T.H. Keitt, A.M. Klein, J. Regetz, and T.H. Ricketts. 2007. Pollination and other ecosystem services produced by mobile organisms: a conceptual framework for the effects of land-use change. *Ecology Letters* 10:299-314.

Krushelnycky, P.D., L.L. Loope, and N.J. Reimer. 2005. The ecology, policy and management of ants in Hawaii. *Proceedings of the Hawaiian Entomological Society* 37.

Lach, L. 2008. Floral visitation patterns of two invasive ant species and their effects on other Hymenopteran visitors. *Ecological Entomology* 33(1):155-160.

Lande, R. 1988. Genetics and demography in biological conservation. *Science* 241:1455-1460.

Liebherr, J.K., and D.A. Polhemus. 1997. R.C.L. Perkins: 100 years of Hawaiian entomology. *Pacific Science* 51(4):343-355.

Liebherr, J. K. 2005. Patterns of endangerment or pathways to enlightenment? Reconstructing the Fauna Hawaiiensis. *Systematics and Biodiversity* 2(2):175-189.

Magnacca, K.N. 2005a. Species Profile: *Hylaeus anthracinus*. In Shepherd, M.D., D.M. Vaughan, and S.H. Black (eds.), *Red List of Pollinator Insects of North America*. CD-ROM Version 1 (May 2005). Portland, OR: The Xerces Society for Invertebrate Conservation.

Magnacca, K.N. 2005b. Species Profile: *Hylaeus assimulans*. In Shepherd, M. D., D. M. Vaughan, and S. H. Black (Eds.), *Red List of Pollinator Insects of North America*. CD-ROM Version 1 (May 2005). Portland, OR: The Xerces Society for Invertebrate Conservation.



Magnacca, K.N. 2005c. Species Profile: *Hylaeus facilis*. In Shepherd, M.D., D.M. Vaughan, and S.H. Black (eds.), Red List of Pollinator Insects of North America. CD-ROM Version 1 (May 2005). Portland, OR: The Xerces Society for Invertebrate Conservation.

Magnacca, K.N. 2005d. Species Profile: *Hylaeus hiliaris*. In Shepherd, M.D., D.M. Vaughan, and S.H. Black (eds.), Red List of Pollinator Insects of North America. CD-ROM Version 1 (May 2005). Portland, OR: The Xerces Society for Invertebrate Conservation.

Magnacca, K.N. 2005e. Species Profile: *Hylaeus kuakea*. In Shepherd, M.D., D.M. Vaughan, and S.H. Black (eds.), Red List of Pollinator Insects of North America. CD-ROM Version 1 (May 2005). Portland, OR: The Xerces Society for Invertebrate Conservation.

Magnacca, K.N. 2005f. Species Profile: *Hylaeus longiceps*. In Shepherd, M.D., D.M. Vaughan, and S.H. Black (eds.), Red List of Pollinator Insects of North America. CD-ROM Version 1 (May 2005). Portland, OR: The Xerces Society for Invertebrate Conservation.

Magnacca, K.N. 2005g. Species Profile: *Hylaeus mana*. In Shepherd, M.D., D.M. Vaughan, and S.H. Black (eds.), Red List of Pollinator Insects of North America. CD-ROM Version 1 (May 2005). Portland, OR: The Xerces Society for Invertebrate Conservation.

Magnacca, K.N., and B.C. Danforth. 2006. Evolution and biogeography of native Hawaiian *Hylaeus* bees (Hymenoptera: Colletidae). *Cladistics* 22(5):393-411.

Magnacca, K.M. 2007a. Conservation status of the endemic bees of Hawaii, *Hylaeus* (*Nesoprosopis*) (Hymenoptera: Colletidae). *Pacific Science* 61(2):173-190.

Magnacca, K.M. 2007b. New records of *Hylaeus* (*Nesoprosopis*) and *Ceratina* bees in Hawaii. *Bishop Museum Occasional Papers* 96:44-45.

Magnacca, K.M. 2011. Email correspondence between Mike Richardson, US Fish and Wildlife, PIFWO Biologist and Karl Magnacca, post-doctoral fellow at the University of Hawaii at Hilo regarding the status of the seven *Hylaeus* bees and his formal comments on the 90-day finding for the species.

Manaaki Whenua Landcare Research. 2011. (Regarding invasive ant species status). [http://www.landcareresearch.co.nz/research/biocons/invertebrates/Ants/invasive\\_ants/solgem\\_info.asp](http://www.landcareresearch.co.nz/research/biocons/invertebrates/Ants/invasive_ants/solgem_info.asp), accessed July 29, 2011.

Mangel, M., and C. Tier. 1994. Four facts every conservation biologist should know about persistence. *Ecology* 75:607-614.

Martin, C. 2007. Coordinating Group on Alien Pest Species, Report to the legislature on efficacy of public outreach on invasive species, August 16, 2007.

Meade-Waldo, G. 1923. Hymenoptera, fam. Apidae, subfam. Prosopidae, fasc. 181. Pp.1-45. In Wystman, P. (Ed.), *Genera Insectorum*. L. Desmet-Verteneuil, Brussels.

Medeiros, A.C., L.L. Loope, and F.R. Cole. 1986. Distribution of ants and their effects on endemic biota of Haleakala and Hawaii Volcanoes National Park: a preliminary assessment. Pp. 39-52. *Proc. 6th Conf. Nat. Sci., Hawaii Volcanoes National Park*.

Michener, C.D. 2000. *The Bees of the World*. The Johns Hopkins University Press: Baltimore and London.

Nafus, D.M. 1993. Extinction, biological control, and insect conservation on islands: in *Perspectives on*

Insect Conservation, Gaston, K.J., T.R. New, and M.J. Samways (eds.), Intercept Ltd., Andover. pp. 139-154.

National Park Service. 2006. Kalaupapa National Historical Park. (Regarding Kalaupapa National Park management). <http://www.nps.gov/kala/index.html>, accessed July 11, 2008.

National Research Council: Committee on the Status of Pollinators in North America. 2007. Status of Pollinators in North America. The National Academies Press: Washington, D.C.

Natural Resources Conservation Service. 1978. Tantalus Series. National Soil Survey Center: National Cooperative Soil Survey. <http://ortho.ftw.nrcs.usda.gov/osd/dat/T/TANTALUS.html>, accessed August 15, 2008.

NatureServe. 2008. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.0. NatureServe, Arlington, Virginia. <http://www.natureserve.org/explorer>, accessed October 21, 2008.

Nishida, G.M. (ed.). 1997. Hawaiian Terrestrial Arthropod Checklist. 3rd ed. Bishop Museum Technical Report No. 12. 263 pp.

Perkins, R.C.L. 1899. Hymenoptera, Aculeata, pp. 1-115, Pls. 1-2. In Sharp, D. (ed.), Fauna Hawaiiensis. Vol. 1. Cambridge University Press, Cambridge, United Kingdom.

Perkins, R.C.L. 1912. The colour-groups of the Hawaiian wasps, etc. Trans. Entomol. Soc. Lond. 1912:677-701.

Perkins, R.C.L. 1913. Introduction. Pp. i-ccxxvii. In Sharp, D. (ed.) Fauna Hawaiiensis. Vol. 1. Cambridge University Press, London.

Pimm, S., H. Lee Jones, and J. Diamond. 1988. On the risk of extinction. American Naturalist 132:757-785.

Reimer, N. J. 1993. Distribution and impact of alien ants in vulnerable Hawaiian ecosystems. In Williams, D. F. (ed.), Exotic Ants: Biology, Impact, and Control of Introduced Species, Westview Press, Boulder. pp. 11-22.

Reimer, N.J. 1994. Distribution of invasive ants in vulnerable Hawaiian ecosystems. In Williams, D.F. (ed.), Exotic Ants: Biology, Impact and Control of Introduced Species. Boulder, Colorado: Westview Press.

Reimer, N.J., J.W. Beardsley, and G. Jahn. 1990. Pest ants in the Hawaiian Islands. Pp. 40-50. In Vander Meer, R.K., K. Jaffe, and A. Cedeno (eds.), Applied Myrmecology: A world perspective. Westview Press, Boulder, CO.

Rock, J.F. 1913. The indigenous trees of the Hawaiian Islands. Pac. Trop. Bot. Garden, Lawai, Kauai, Hawaii, and Charles E. Tuttle Co., Rutland, Vermont and Tokyo, Japan.

Sahli, H., D. Drake, A. Taylor, T. Fukami and E. Stacy. 2008. Changes in pollination across an elevation gradient on the island of Hawaii. Abstract, 93rd ESA Annual Meeting, Milwaukee, Wisconsin, Aug 3-Aug 8, 2008. <http://eco.confex.com/eco/2008/techprogram/P12618.HTM>, accessed July 29, 2008.

Sakai, A.K., W.L. Wagner, and D.M. Ferguson. 1995. Origins of dioecy in the Hawaiian flora. Ecology 76:2517-2529.

Sakai, A.K., W.L. Wagner, and L.A. Mehrhoff. 2002. Patterns of endangerment in the Hawaiian flora. Systematic Biology 51:276-302.

- Sherley, G. (ed.). 2000. Invasive species in the Pacific: A technical review and draft regional strategy. Apia, Samoa: South Pacific Regional Environment Programme.
- Smith, C.W. 1985. Impact of non-native plants on Hawaii's native biota. In Stone, C.P., and J.M. Scott (eds.). Hawaii's terrestrial ecosystems: preservation and management, pp. 180-250. Cooperative National Park Resources Study Unit, University of Hawaii, Honolulu, Hawaii.
- Smith, C.W., and J.T. Tunison. 1992. Fire and invasive plants in Hawaii: research and management implications for native ecosystems. In Stone, C.P., and J.M. Scott (eds.), Hawaii's terrestrial ecosystems: preservation and management. Pp. 394-408. Cooperative National Park Resources Study Unit, University of Hawaii. Honolulu. Hawaii.
- Snelling, R.R. 2003. Bees of the Hawaiian Islands, exclusive of *Hylaeus* (*Nesoprosopis*) (Hymenoptera: Apoidea). Journal of the Kansas Entomological Society 76:342-356.
- Soule, M.E. 1986. Minimum viable populations: Processes of Species Extinction. Pp.19-34. In Soule, M.E. (ed.), Conservation Biology: The Science of Scarcity and Diversity. Sinauer Associates, Inc., Sunderland, Massachusetts, U.S.A.
- Staples, G.W., and R.H. Cowie (eds.) 2001. Hawaii's Invasive Species. Mutual Publishing and Bishop Museum Press. Honolulu. 111 pp.
- Stone, C.P. 1985. Invasive animals in Hawaii's native ecosystems: toward controlling the adverse effects of introduced vertebrates. Pp. 251-288. In Stone, C.P., and J.M. Scott (eds.), Hawaii's Terrestrial Ecosystems: Preservation and Management. Cooperative National Park Resources Study Unit. Honolulu: University of Hawaii.
- Stone, C.P., and L.L. Loope. 1987. Reducing negative effects of introduced animals on native biotas in Hawaii: What is being done, what needs doing, and the role of national parks. Environmental Conservation 14:245-258.
- Takeuchi, W. 1991. Botanical survey of Puuwaawaa, final report. Department of Land and Natural Resources, Division of Forestry and Wildlife, Honolulu. 69 pp.
- (TNC) The Nature Conservancy. 2000. Honouliuli Reserve Master Plan.  
<http://www.nature.org/wherewework/northamerica/states/hawaii/files/finalmp.pdf>, accessed July 4, 2008.
- (TNC) The Nature Conservancy. 2003. Last Stand, The Vanishing Hawaiian Forest. 24 pp.
- (TNC) The Nature Conservancy. 2005. South Ekahanui Fence and Restoration Project at Honouliuli Preserve, Phases 1 and 3: Final Report, pp. 16-17.
- (TNC) The Nature Conservancy. 2006a. Coastal vegetation. Hawaiian High Islands Ecoregion Plan, <http://www.hawaiiecoregionplan.info/coastalsystem.html>, accessed December 1, 2009.
- (TNC) The Nature Conservancy. 2006b. Lowland dry system. Hawaiian High Islands Ecoregion Plan, <http://www.hawaiiecoregionplan.info/LDsystem.html>, <http://www.hawaiiecoregionplan.info/home.html>, accessed April 22, 2008.
- (TNC) The Nature Conservancy. 2006c. Lowland mesic system. Hawaiian High Islands Ecoregion Plan, <http://www.hawaiiecoregionplan.info/LMsystem.html>, <http://www.hawaiiecoregionplan.info/home.html>, accessed December 11, 2007.

(TNC) The Nature Conservancy. 2006d. Lowland wet system. Hawaiian High Islands Ecoregion Plan, <http://www.hawaiiecoregionplan.info/LWsystem.html>, <http://www.hawaiiecoregionplan.info/home.html>, accessed December 11, 2007.

(TNC) The Nature Conservancy. 2006e. Montane wet system. Hawaiian High Islands Ecoregion Plan, <http://www.hawaiiecoregionplan.info/MWsystem.html>, <http://www.hawaiiecoregionplan.info/home.html>, accessed December 11, 2007.

(TNC) The Nature Conservancy. 2009. Moomomi Preserve Molokai, Hawaii. FY2010 Operational Plan and FY2009 Final Progress Report. Submitted to the Department of Land & Natural Resources Natural Area Partnership Program August 2009. 21 pp.

The Nature Conservancy Natural Heritage Program. 2003. In The Hawaiian Conservation Alliance: Conservation of Biological Resources in Hawaii.

[http://hawaiiconservation.org/\\_library/documents/statusreport.pdf](http://hawaiiconservation.org/_library/documents/statusreport.pdf) , accessed 20 August 2008.

U.S. Army Garrison 2007. Ecosystem management in Kaena Point. 2007 Status Report for Makua Implementation Plan and the Draft Oahu Implementation Plan, Directorate of Public Works, Environmental Division, Schofield Barracks. Fire appendices.

U.S. Army Garrison 2009. Ecosystem management in Kaena Point. 2009 Status Report for Makua Implementation Plan and the Draft Oahu Implementation Plan, Directorate of Public Works, Environmental Division, Schofield Barracks. Fire appendices.

(USFWS) U.S. Fish and Wildlife Service. 1999. Recovery Plan for the Multi-Island Plants. U.S. Fish and Wildlife Service: Portland, Oregon.

(USFWS) U.S. Fish and Wildlife Service. 2004. Biological Opinion of the U.S. Fish and Wildlife Service for routine military training and transformation of the 2nd Brigade 25th Infantry Division (Light) U.S. Army Installations of Hawaii. 217 pp.

(USFWS) U.S. Fish and Wildlife Service. 2008. Hawaiian Islands Plants: Listed species, as designated under the U.S. Endangered Species Act. <http://www.fws.gov/pacificislands/wesa/HIlistingplants.pdf>, accessed June 23, 2008.

Vitousek, P.M., C.M. DAntonio, L.L. Loope, M. Rejmanek, and R. Westerbrooks. 1997. Introduced species: a significant component of human-caused global change. *New Zealand Journal of Ecology* 21:1-16.

Wagner, W.L., D.R. Herbst, and S. H. Sohmer. 1999. *Manual of the Flowering Plants of Hawaii*. Honolulu: University of Hawaii Press.

Warren, S.D. 2004. Degradation and recovery of vegetation on Kahoolawe Island, Hawaii: A photographic journey. *Pacific Science* 58(3):461-495.

Wilson, E.E., L.M. Mullen, and D.A. Holway. 2009. Life history plasticity magnifies the ecological effects of a social wasp invasion. *Proceedings of the National Academy of Science. USA*. 5 pp.

Wong, M.A., and T.T.Y. Wong. 1988. Predation of the Mediterranean fruit fly and oriental fruit fly (Diptera: Tephritidae) by the fire ant (Hymenoptera: Formicidae) in Hawaii. *Proceedings of the Hawaiian Entomological Society* 28:169-177.

Xerces Society for Invertebrate Conservation. 2009a. Petition to list two species of Hawaiian yellow-faced bees (*Hylaeus anthracinus* and *Hylaeus longiceps*) as endangered under the U.S. Endangered Species Act. 49

pp.

Xerces Society for Invertebrate Conservation. 2009b. Petition to list one species of Hawaiian yellow-faced bees (*Hylaeus assimulans*) as endangered under the U.S. Endangered Species Act. 34 pp.

Xerces Society for Invertebrate Conservation. 2009c. Petition to list one species of Hawaiian yellow-faced bees (*Hylaeus facilis*) as endangered under the U.S. Endangered Species Act. 38 pp.

Xerces Society for Invertebrate Conservation. 2009d. Petition to list one species of Hawaiian yellow-faced bees (*Hylaeus hiliaris*) as endangered under the U.S. Endangered Species Act. 23 pp.

Xerces Society for Invertebrate Conservation. 2009e. Petition to list two species of Hawaiian yellow-faced bees (*Hylaeus mana* and *Hylaeus kuakea*) as endangered under the U.S. Endangered Species Act. 24pp.

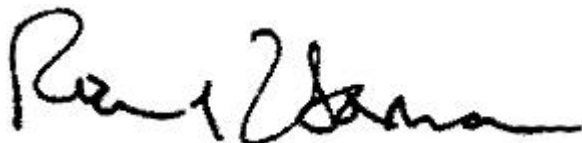
Zimmerman, E.C. 1948. Insects of Hawaii. Vol. 1. Introduction. xv. Univ. of Hawaii Press, Honolulu.

Zimmerman, E.C. 1972. Adaptive radiation in Hawaii with special reference to insects. Pp.528-534. In Key, A. (ed.), A Natural History of The Hawaiian Islands. Honolulu: University Press of Hawaii.

### Approval/Concurrence:

Lead Regions must obtain written concurrence from all other Regions within the range of the species before recommending changes, including elevations or removals from candidate status and listing priority changes; the Regional Director must approve all such recommendations. The Director must concur on all resubmitted 12-month petition findings, additions or removal of species from candidate status, and listing priority changes.

Approve:



06/13/2013

Date

Concur:



10/28/2013

Date

Did not concur:

\_\_\_\_\_

\_\_\_\_\_

Date

Director's Remarks: